

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

CODY WALTERS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:13-CV-01475JCH
	)	
DIVISION OF YOUTH SERVICES	)	
OF THE STATE OF MISSOURI, et al.	)	
	)	
Defendants.	)	

**STIPULATION**

Plaintiff Cody Walters and Defendants Division of Youth Services of the State of Missouri, Richard Stewart, Brian Hicks, Kevin Cooper, Austin Arms, Ashley Bryant, Mike Burchard, and Greg Adams hereby stipulate as follows:

1. The parties have engaged in frequent communications regarding certain privilege issues raised in Defendants' responses to Plaintiff's discovery requests.
2. The parties have agreed to proceed in a certain manner with regard to those privilege issues and will submit two orders to the Court for entry when the Court is available. Those orders are attached hereto as exhibits A and B.

3. In order to properly manage the deadlines in the court's current Case Management Order, the parties have scheduled depositions on June 30, 2014 and July 1, 2014, respectively. In order to conduct those depositions, Plaintiff wishes to have the documents referenced in Exhibits A and B prior to the depositions.
4. As the Court will not be available to sign those orders prior to those depositions, and as the parties anticipate the Court will ultimately do so, or sign orders substantially similar to Exhibits A and B, the parties wish to enter into this stipulation.
5. Accordingly, the parties hereby agree to move forward in this litigation pursuant to the terms of the proposed protective order as if the Court has signed those discovery orders unless and until the Court decides it will not sign those orders or orders in substantially similar form.
6. In the event the Court chooses not to sign those orders or orders in substantially similar form, the parties hereby agree that Plaintiff will return any documents and any copies thereof produced pursuant to this stipulation within 5 days. Further, the parties agree that any deposition testimony regarding such records or arising out of the production of those records will be stricken.

Respectfully submitted,

**CHRIS KOSTER**

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